

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**TQ DELTA, LLC,**

*Plaintiff,*

v.

**COMMSCOPE HOLDING COMPANY, INC.,  
COMMSCOPE INC., ARRIS  
INTERNATIONAL LIMITED, ARRIS  
GLOBAL LTD., ARRIS US HOLDINGS, INC.,  
ARRIS SOLUTIONS, INC., ARRIS  
TECHNOLOGY, INC., and ARRIS  
ENTERPRISES, LLC,**

*Defendants.*

CIV. A. NO. 2:21-CV-310-JRG  
(Lead Case)

**TQ DELTA, LLC,**

*Plaintiff,*

v.

**NOKIA CORP., NOKIA SOLUTIONS AND  
NETWORKS OY, and NOKIA OF AMERICA  
CORP.,**

*Defendants.*

CIV. A. NO. 2:21-CV-309-JRG  
(Member Case)

**NOKIA OF AMERICA CORP.,**

*Third-Party Plaintiff,*

v.

**BROADCOM CORP., BROADCOM INC., and  
AVAGO TECHNOLOGIES  
INTERNATIONAL SALES PTE. LTD.,**

*Third-Party  
Defendants.*

**DECLARATION OF DARLENA H. SUBASHI, ESQ., IN SUPPORT OF  
NOKIA'S OPPOSITION TO THE THIRD-PARTY DEFENDANTS'  
MOTION TO DISMISS**

[REDACTED]

I, Darlena H. Subashi, hereby declare under penalty of perjury that:

1. I am an attorney at the law firm of Alston & Bird LLP, counsel for Defendants Nokia of America Corporation, Nokia Solutions and Networks Oy, and Nokia Corporation (“Nokia”). I am a member in good standing of the Bars of Massachusetts, North Carolina, and New York and am admitted to practice before this Court. I am filing this declaration in support of NOKIA’S OPPOSITION TO THE THIRD-PARTY DEFENDANTS’ MOTION TO DISMISS. Except where otherwise indicated, I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED] Highlighting has been added for the convenience of the Court.

3. Attached as Exhibit 2 is a true and correct copy of correspondence from Howard Shatz to Ryan D. Phillips, dated August 26, 2021. Highlighting has been added for the convenience of the Court.

4. Attached as Exhibit 3 is a true and correct copy of correspondence from Ryan D. Phillips to Howard Shatz, dated October 7, 2021. Highlighting has been added for the convenience of the Court.

5. Attached as Exhibit 4 is a true and correct copy of correspondence from Howard Shatz to Ryan D. Phillips, dated November 17, 2021. Highlighting has been added for the convenience of the Court.

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. Attached as Exhibit 5 is a true and correct copy of email correspondence from Howard Shatz to Ryan D. Phillips, dated November 29, 2021. Highlighting has been added for the convenience of the Court.

8. Attached as Exhibit 6 is a true and correct copy of correspondence from Ryan D. Phillips to Howard Shatz, dated December 6, 2021. Highlighting has been added for the convenience of the Court.

9. Attached as Exhibit 7 is a true and correct copy of correspondence from Howard Shatz to Ryan D. Phillips, dated December 16, 2021. Highlighting has been added for the convenience of the Court.

10. [REDACTED]

[REDACTED]

11. [REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Date: April 28, 2022

/s/ Darlena H. Subashi  
Darlena H. Subashi